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February 25, 2010

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, D.C. 20554

RE: EB Docket No. 06-36
Annual 64.2009(e) CPNI Certification for 2009
Form 499 Filer ID 803352

Dear Ms. Dortch:

Enclosed for filing is the 2009 CPNI Compliance Certification for Brown County MSA Cellular Limited Partnership, d/b/a Cellcom. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with the Public Notice DA 10-91 issued January 15, 2010.

Please contact me at 920-617-7175 or larry.lueck@nsight.com if you have any questions about this filing.

Sincerely,

Larry L. Lueck
Manager of Government Relations

cc: Best Copy and Printing, Inc. (via e-mail)

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Green Bay, WI 54313
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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010 covering the prior calendar year 2009

1. Date filed: February ²⁵27, 2010
2. Name of company covered by this certification: Brown County MSA Cellular Limited Partnership, d/b/a Cellcom
3. Form 499 Filer ID: 803352
4. Name of signatory: Dan Fabry
5. Title of signatory: Vice President & Chief Operating Officer of Mobile Services
6. Certification:

I, Dan Fabry, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has received one customer complaint in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed  _____

Attachments: Accompanying Statement explaining CPNI procedures
Summary of customer complaints

STATEMENT

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Carrier has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Carrier's retail locations, electronically or otherwise. In connection with these procedures, Carrier has established a system of personal identification numbers (PINs), passwords and back-up authentication methods for all customer and accounts, in compliance with the requirements of applicable Commission rules.
- Carrier has established procedures to ensure that customers will be immediately notified of account changes including changes to passwords, back-up means of authentication for lost or forgotten passwords, or address of record.
- Carrier has established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.
- Carrier had no issues with data brokers in 2009, therefore no action was required.
- Carrier has no new or additional information with respect to the processes pretexters are using to attempt to access CPNI. Carrier's current CPNI procedures are designed to protect against pretexters.
- The following is a summary of all customer complaints received in 2009 regarding the unauthorized release of CPNI:
 - Number of customer complaints Carrier received in 2009 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: 1 (one)
 - Category of complaint:
 - 1 – Number of other instances of improper access or disclosure
 - Summary of customer complaints received in 2009 concerning the unauthorized release of CPNI: A customer informed us that in their invoice they had also received six invoice pages belonging to a different customer. Our third-party mailing vendor had inadvertently included those six pages with this customer's invoice. The customer whose six pages were included in the other customer's invoice was the only one impacted by this error.